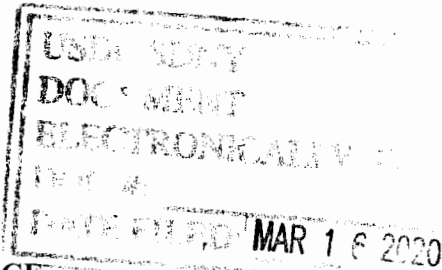




**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*



March 16, 2020

**BY ECF**

**SO ORDERED**

The Honorable George B. Daniels  
Chief United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

MAR 16 2020

The March 17, 2020 status  
conference is adjourned to  
April 21, 2020 at 9:45 a.m.

*George B. Daniels*  
HON. GEORGE B. DANIELS

Re: United States v. William Bradley, a/k/a "Red," 19 Cr. 632 (GBD)

Dear Judge Daniels:

A status conference in the above-captioned case is scheduled for March 17, 2020, at 10 a.m. The Government writes respectfully to request that the Court adjourn the status conference for approximately 60 days.

The Government and the defense have been actively engaged in discussions regarding possible pre-trial disposition. However, the parties do not expect to be able to complete these discussions prior to the scheduled conference. Moreover, as the Court is aware, defense counsel's ability to communicate with and visit the defendant has been restricted, and will continue to be for at least 30 days, as a result of measures taken in response to the spread of COVID-19. Therefore, the Government requests that the Court adjourn the status conference for approximately 60 days, to allow these discussions to continue.

In the event that the Court grants the requested adjournment, the Government respectfully requests that the Court exclude time under the Speedy Trial Act, from March 17, 2020 to the date that the conference is rescheduled, to permit the parties to continue discussions of possible pre-trial disposition. The Government submits that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A).

The undersigned has conferred with counsel for the defendant, who has consented to the adjournment and exclusion of time.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

By:   
Brett M. Kalikow  
Assistant United States Attorneys  
(212) 637-2220

cc: Jean Barrett, Esq. (via ECF)